

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

IN RE: JOHNSON & JOHNSON TALCUM  
POWER PRODUCTS MARKETING, SALES  
PRACTICES, AND PRODUCTS LIABILITY  
LITIGATION

No. 3:16-md-02738-MAS-RLS

This Document Relates To:

*Bondurant v. Johnson & Johnson*

No. 3:19-cv-14366-MAS-RLS

*Gallardo v. Johnson & Johnson*

No. 3:18-cv-10840-MAS-RLS

*Judkins v. Johnson & Johnson*

No. 3:19-cv-12430-MAS-RLS

**DECLARATION OF JESSICA DAVIDSON IN SUPPORT OF  
DEFENDANTS JOHNSON & JOHNSON AND LLT MANAGEMENT,  
LLC'S MEMORANDUM OF LAW IN SUPPORT OF MOTION TO  
EXCLUDE THE SPECIFIC CAUSATION OPINIONS OFFERED BY DR.  
JUDITH WOLF**

I, Jessica Davidson, declare as follows:

I am an attorney and a partner with the law firm Skadden, Arps, Slate, Meagher & Flom LLP, counsel for Defendants Johnson & Johnson and LLT Management, LLC (hereafter, "Defendants") in the above-captioned matter. The facts stated in this Declaration are true of my own personal knowledge. I submit this

Declaration in Support of Defendants' Memorandum of Law in Support of Motion to Exclude the Specific Causation Opinions Offered by Dr. Judith Wolf.

1. Attached hereto as **Exhibit 1** is a true and correct copy of excerpts of the transcript of the deposition of Judith Wolf, September 13, 2021, in the above case.
2. Attached hereto as **Exhibit 2** is a true and correct copy of the Second Amended Report of Judith Wolf Re: Linda Bondurant, May 28, 2024, in the above case.
3. Attached hereto as **Exhibit 3** is a true and correct copy of the Second Amended Report of Judith Wolf Re: Carter Judkins, May 28, 2024, in the above case.
4. Attached hereto as **Exhibit 4** is a true and correct copy of the Second Amended Report of Judith Wolf Re: Anna Gallardo, May 28, 2024, in the above case.
5. Attached hereto as **Exhibit 5** is a true and correct copy of excerpts of the transcript of the deposition of Judith Wolf, September 14, 2021, in the above case.
6. Attached hereto as **Exhibit 6** is a true and correct copy of Saavalainen, *Risk of Gynecologic Cancer According to the Type of Endometriosis*, 131(6) Obstet. & Gynecol. 1095 (2018).

7. Attached hereto as **Exhibit 7** is a true and correct copy of Noli, *Long Term Survival of Ovarian Endometriosis Associated Clear Cell and Endometrioid Ovarian Cancers*, 23(2) Int'l J. Gynecol. Cancer 244 (2013).
8. Attached hereto as **Exhibit 8** is a true and correct copy of Barnard, *Endometriosis Typology and Ovarian Cancer Risk*, JAMA (2024).
9. Attached hereto as **Exhibit 9** is a true and correct copy of Wentzensen & O'Brien, *Talc, Body Powder, and Ovarian Cancer: A Summary of the Epidemiologic Evidence* 163 Gynecol. Oncol. 199 (2021).
10. Attached hereto as **Exhibit 10** is a true and correct copy of Berge, *Genital Use of Talc and Risk of Ovarian Cancer: A Meta-analysis*, 27(3) Eur. J. Cancer Prev. 248 (2018).
11. Attached hereto as **Exhibit 11** is a true and correct copy of Taher, *Critical Review of the Association Between Perineal Use of Talc Powder and Risk of Ovarian Cancer*, 90 Reproductive Toxicology 88 (2019).
12. Attached hereto as **Exhibit 12** is a true and correct copy of Penninkilampi & Eslick, *Perineal Talc Use and Ovarian Cancer: A Systematic Review and Meta-Analysis*, 29(1) Epidemiology 41 (2018).
13. Attached hereto as **Exhibit 13** is a true and correct copy of Gabriel, *Douching, Talc Use, and Risk for Ovarian Cancer and Conditions Related to Genital Tract Inflammation*, 28(11) Cancer Epidemiol. Biomarkers Prev 1835 (2019).

14. Attached hereto as **Exhibit 14** is a true and correct copy of the Report of Michael A. Finan Re: Linda Bondurant, May 28, 2024, in the above case.

15. Attached hereto as **Exhibit 15** is a true and correct copy of Cramer, *The Association Between Talc Use and Ovarian Cancer: A Retrospective Case-Control Study in Two US States*, 27(3) Epidemiology 334 (2016).

16. Attached hereto as **Exhibit 16** is a true and correct copy of excerpts of the transcript of the deposition of Anna Gallardo, January 12, 2021, in the above case.

17. Attached hereto as **Exhibit 17** is a true and correct copy of excerpts of the transcript of the deposition of Judith Wolf, April 25, 2024, in the above case.

18. Attached hereto as **Exhibit 18** is a true and correct copy of Liu, *Menopausal Hormone Replacement Therapy and the Risk of Ovarian Cancer: A Meta-Analysis*, 10(801) Front. Endocrinol. 1 (2019).

19. Attached hereto as **Exhibit 19** is a true and correct copy of Cramer, *Presence of Talc in Pelvic Lymph Nodes of a Woman With Ovarian Cancer and Long-Term Genital Exposure to Cosmetic Talc*, 110(2) Obstet. & Gynecol. 498 (2007).

20. Attached hereto as **Exhibit 20** is a true and correct copy of Heller, *The Relationship Between Perineal Cosmetic Talc Usage and Ovarian Talc Particle Burden*, 174(5) Am. J. Obstet. Gynecol. 1507 (1996).

I certify under penalty of perjury that the foregoing is true and correct.

Dated: July 23, 2024

A handwritten signature in cursive script that reads "Jessica Davidson".

---

Jessica Davidson